

1 GIA N. MARINA  
Nevada Bar No. 15276  
2 **CLARK HILL PLLC**  
1700 South Pavilion Center Drive, Suite 500  
3 Las Vegas, Nevada 89135  
E-mail: gmarina@clarkhill.com  
4 Telephone: (702) 862-8300  
Facsimile: (702) 778-9709  
5 *Attorney for Defendant*  
6 *National Consumer Telecom & Utilities*  
*Exchange, Inc.*

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 KING SCOTT,

11 Plaintiff,

12 vs.

13 NATIONAL CONSUMER TELECOM &  
14 UTILITIES EXCHANGE, INC., CLARITY  
SERVICES, INC.

15 Defendants.  
16

**Case No. 2:25-cv-00398-CDS-NJK**

**JOINT MOTION FOR EXTENSION OF  
TIME FOR DEFENDANT NATIONAL  
CONSUMER TELECOM & UTILITIES  
EXCHANGE, INC. TO FILE ANSWER**

**FIRST REQUEST**

17 Defendant National Consumer Telecom & Utilities Exchange, Inc. ("NCTUE") has  
18 requested an extension of time to answer, move or otherwise respond to the Complaint in this  
19 matter, to which Plaintiff has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY  
20 STIPULATED AND AGREED to by and among counsel, that NCTUE's time to answer, move or  
21 otherwise respond to the Complaint in this action is extended from April 1, 2025 through and  
22 including **May 1, 2025**. The request was made by NCTUE so that it can have an opportunity to  
23 collect and review its internal files pertaining to the allegations in the Complaint, and Plaintiff

24 //

25  
26  
27  
28

1 approves. This stipulation is filed in good faith and not intended to cause delay.

2 Respectfully submitted, this 31st day of March, 2025.

3  
4 CLARK HILL PLLC

5 By: /s/ Gia N. Marina

6 Gia N, Marina

7 1700 South Pavilion Center Drive, Suite 500

8 Las Vegas, Nevada 89135

9 Telephone: (702) 862-8300

10 Facsimile: (702) 778-9709

11 Email: gmarina@clarkhill.com

12 *Attorney for Defendant National Consumer*

13 *Telecom & Utilities Exchange, Inc.*

**No opposition**

/s/ Gerardo Avalos

George Haines, Esq.

Nevada Bar No. 9411

Gerardo Avalos

Nevada Bar No. 15171

FREEDOM LAW GROUP

8985 S. Eastern Ave., Suite 350

Henderson, NV 89123

Phone: (702) 880-5554

Fax: (702) 385-5518

Email: ghaines@freedomlegalteam.com

Email: gavalos@freedomlegalteam.com

*Attorneys for Plaintiff*

14  
15  
16  
17 IT IS SO ORDERED:

18  
19   
20 United States Magistrate Judge

21 DATED: \_ April 1, 2025